

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

THE UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
vs.)	
)	4:15CR00049 CDP/DDN
)	
RAMIZ ZIJAD HODZIC, et al.,)	
)	
Defendant.)	

JOINT REQUEST FOR EXTENSION OF TIME TO FILE
MOTION TO DISMISS

COME now Defendants, by and through undersigned counsel, and hereby request an extension of time to file a Motion to Dismiss. In support of said request, Defendants hereby state as follows:

1. At the Status Conference on August 20, 2015, this Court set the date of October 7, 2015, for the filing of Defendants' Non-Evidentiary Motions to Dismiss (Document 193).
2. All counsel have been engaged in preparing their respective Pretrial Motions, including non-evidentiary Motions to Dismiss challenging the contents of the Indictment.
3. After investigation and research, counsel believe that to file a meaningful Motion to Dismiss, it is necessary to delve deeper into the voluminous discovery material with our respective clients.
4. Given the complexity of this matter, as well as the volume of discovery received, and potentially to be received, and the need for experts to assist in the translating of discovery materials related to such a Motion, Defendants collectively request additional time to prepare and file their respective Pretrial Motions, including Non-Evidentiary Motions to Dismiss.

5. Counsel would request that this Court set a new deadline at the Status Conference set for Thursday, October 8, 2015.

6. This request for an extension of the Motion deadline certainly would not preclude any individual Defendant from filing a Motion before it is due.

7. Counsel for Defendants have discussed this motion with Assistant U.S. Attorney Matthew Drake who has no objection to this request for extension.

WHEREFORE, for the foregoing reasons, Defendants request this Court grant their joint request for an extension of time to file any motions as Ordered by this Court on August 20, 2015 (Doc. 193), and for any and further relief this Court finds just and prudent under the circumstances.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

Signature of the foregoing document is also certification that a true and correct copy has been filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following on this 6th day of October, 2015 to:

Matthew Drake
Assistant United States Attorney
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/s/ JoAnn Trog
Attorney for Defendant Nihad Rosic